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SUPERIOR COURT
OF CALIFORNIA
COUNTY OF FRESNO

10 SUPERIOR COURT OF CALIFORNIA
11 COUNTY OF FRESNO

13 THE PEOPLE OF THE STATE OF
14 CALIFORNIA,

Plaintiff,

15 v.
16

17 NOE JIMENEZ, DOB 12/3/67;
18 SUSAN PATRICIA NESBITT, DOB 3/30/66;
REE L. BRUCE, DOB 5/27/55;
19 MARTY CHARLES McCLUE, DOB 8/25/62;
TERRANCE LYNN WARD, DOB 2/8/63;
20 KIRSTEN PAXTON, DOB 8/22/93;
DESIREE ROBLEDO aka LOVE ROBLEDO
21 aka AMBER ROBLEDO, DOB 1/14/88;
WILLIAM STOUTINGBURG JR., DOB
22 5/20/87,

Defendants.

CASE NO. F17901545
INFORMATION

1 I, the undersigned, say on information and belief, that in the County of Fresno, State of
2 California:

3 **INTRODUCTION**

4 At all times relevant to this Information:

5 The Fresno County Public Administrator's Office ("FCPA") was an arm of the County of
6 Fresno. Its function is to manage estates and make final arrangements for Fresno County
7 residents who die without a will or any known relatives able or willing to act on the decedent's
8 behalf. The FCPA's role was to manage the estate through probate until proper distribution of the
9 proceeds of the estate could be completed.

10 Defendant NOE JIMINEZ ("JIMINEZ") was an employee of the County of Fresno and
11 held the position of Deputy Probate Administrator with the FCPA.

12 Defendant SUSAN PATRICIA NESBITT ("NESBITT") was an employee of the County of
13 Fresno and held the position of Senior Probate Administrator with the FCPA.

14 Defendant REE L. BRUCE ("BRUCE") was an employee of the County of Fresno and held
15 the position of Estate Property Assistant with the FCPA.

16 Defendant MARTY CHARLES McCLUE ("McCLUE") was an employee of the County
17 of Fresno and worked at the Fresno County Public Guardian's Office.

18 Defendant TERRANCE LYNNE WARD ("WARD") was an acquaintance of defendant
19 NESBITT and was an employee of the County of Tulare.

20 Defendant KIRSTEN PAXTON ("PAXTON") was in a relationship with defendant
21 JIMINEZ' son and was hired by defendant JIMINEZ to work for the FCPA and clean up a house
22 of a decedent.

23 Defendant DESIREE ROBLEDO aka LOVE ROBLEDO aka AMBER ROBLEDO
24 ("ROBLEDO") was the niece of defendant JIMINEZ and FCPA occasionally hired her to assist
25 in cleaning up the properties of the deceased administered by FCPA.

26 Defendant WILLIAM STOUTINGBURG JR. ("STOUTINGBURG") was the nephew of
27 defendant NESBITT and was occasionally hired by defendant NESBITT, through her authority
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1 with FCPA, to assist in cleaning up the properties of the deceased administered by FCPA, and
2 performed lawn service, repair work, and removed trash and emptied storage units for FCPA.

3 **COUNT ONE**

4 That on or about and between January 1, 2010 and December 31, 2015, defendants NOE
5 JIMINEZ, SUSAN PATRICIA NESBITT, REE L. BRUCE, MARTY CHARLES McCLUE,
6 TERRANCE LYNN WARD, DESIREE ROBLEDO, and WILLIAM STOUTINGBURG JR. did
7 commit a FELONY, namely a violation of section 182(a)(1) of the Penal Code, CONSPIRACY
8 TO COMMIT A CRIME, in that said Defendants did unlawfully conspire together and with
9 another person and persons whose identity is unknown to commit the crimes of Perjury, a felony,
10 in violation of section 118(a) of the Penal Code; Receiving Stolen Property Exceeding \$950 in
11 Value, a felony, in violation of section 496(a) of the Penal Code; Embezzlement, a felony, in
12 violation of section 504 of the Penal Code; that pursuant to and for the purpose of carrying out the
13 objectives and purposes of the aforesaid conspiracy, that said defendants committed the following
14 over act and acts in the County of Fresno:

15 **Overt Act 1**

16 On or about July 18, 2011, defendant BRUCE signed the invoices for the tow of two
17 vehicles – a 1979 Oldsmobile and a 1967 Ford Galaxy - that belonged to the estate of Hanson
18 Bufkin (“Bufkin estate”) and that were towed from the decedent’s address and delivered to the
19 FCPA.

20 **Overt Act 2**

21 On or about July 19, 2011, defendant JIMINEZ omitted or caused the omission of a vehicle,
22 the 1967 Ford Galaxy, from the trial balance report for the Bufkin estate.

23 **Overt Act 3**

24 On or about August 11, 2011, defendant WARD signed his name to the title for the 1967
25 Ford Galaxy that belonged to the Bufkin estate using defendant NESBITT’S address.

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1 **Overt Act 4**

2 On or about March 28, 2014, defendant JIMINEZ caused the 1967 Ford Galaxy to be sold
3 at auction and then deposited the proceeds of the auction sale, \$8,375.00, into his personal bank
4 account.

5 **Overt Act 5**

6 On or about September 16, 2011, defendant BRUCE pawned three sterling spoons, three
7 sterling forks, and one sterling cup.

8 **Overt Act 6**

9 On or about December 1, 2011, defendants JIMINEZ and NESBITT caused a check from
10 the estate of Sylvia Welch for \$2,956.73 to be issued to defendant WARD.

11 **Overt Act 7**

12 On or about December 5, 2011, defendant WARD deposited a check from the estate of
13 Sylvia Welch for \$2,956.73 into his personal bank account.

14 **Overt Act 8**

15 On or about April 2, 2012, defendant JIMINEZ signed or caused the signing of Dr. Edmund
16 Kal's signature on the title of Dr. Kal's 2003 Volkswagen, which then purported to sell it to
17 defendant JIMINEZ for \$2,000.00.

18 **Overt Act 9**

19 On or about May 15, 2012, defendant JIMINEZ sold valuable coins that belonged to the
20 estate of Dr. Edmund Kal and retained the proceeds.

21 **Overt Act 10**

22 On or about May 21, 2012, defendant NESBITT sold valuable coins that belonged to the
23 estate of Dr. Edmund Kal and retained the proceeds.

24 **Overt Act 11**

25 On or about May 31, 2012, defendant BRUCE sold valuable coins that belonged to the
26 estate of Dr. Edmund Kal and retained the proceeds.

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1 **Overt Act 12**

2 On or about June 9, 2012, defendant NESBITT sold valuable coins that belonged to the
3 estate of Dr. Edmund Kal and retained the proceeds.

4 **Overt Act 13**

5 On or about June 15, 2012, defendant McCLUE received approximately \$2,293.00 from the
6 Fresno Auction Company for items he sold using their services.

7 **Overt Act 14**

8 On or about July 25, 2012, defendant JIMINEZ sold valuable coins that belonged to the
9 estate of Dr. Edmund Kal and retained the proceeds.

10 **Overt Act 15**

11 On or about August 20, 2012, defendant NESBITT sold valuable coins that belonged to the
12 estate of Dr. Edmund Kal and retained the proceeds.

13 **Overt Act 16**

14 On or about November 6, 2012, defendant McCLUE sold 21 silver coins, 104 Cull silver
15 dollars, and one-ounce silver round to JEM Coin and Jewelry ("JEM"), a Fresno business that
16 bought and sold coins, jewelry, silver, scrap gold and diamonds, for approximately \$8,637.00.

17 **Overt Act 17**

18 On or about and between November 28, 2012 and December 3, 2012, defendant JIMINEZ
19 sold valuable coins to JEM and was paid \$33,316.00.

20 **Overt Act 18**

21 In December 2012, defendant JIMINEZ took possession of but never invoiced
22 approximately \$5,416.80, diamond rings, and a Mickey Mouse watch that belonged to the estate
23 of Vina Snelgrove.

24 **Overt Act 19**

25 On or about April 17, 2013, defendants JIMINEZ and NESBITT caused a check from the
26 estate of Sylvia Welch for \$5,278.94 to be issued to defendant WARD.

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1 **Overt Act 20**

2 On or about April 23, 2013, defendant WARD deposited a check from the estate of Sylvia
3 Welch for \$5,278.94 into his personal bank account.

4 **Overt Act 21**

5 On or about and between September 3, 2009 and June 13, 2013, defendant JIMINEZ
6 claimed the life insurance policy of the decedent Frank Fields.

7 **Overt Act 22**

8 On or about June 13, 2013, defendant JIMINEZ caused the FCPA to issue two checks
9 totaling \$44,041.10 of money that belonged to the Fields' estate to defendant PAXTON.

10 **Overt Act 23**

11 On or about June 13, 2013, defendant PAXTON kept \$5,000 of the proceeds of the life
12 insurance of Frank Fields and gave the remaining funds from the original \$44,041.10 to defendant
13 JIMINEZ.

14 **Overt Act 24**

15 On or about July 3, 2013, defendant JIMINEZ signed DMV documents in order to transfer
16 a vehicle that belonged to the estate of Matthew Turck that falsely stated that the FCPA was
17 administering the estate of the decedent Matthew Turck.

18 **Overt Act 25**

19 On or about July 22, 2013, defendant McCLUE received approximately \$2,782.00 from the
20 Fresno Auction Company for items he sold using their services.

21 **Overt Act 26**

22 On or about September 11, 2013, defendant NESBITT left a \$480 check for defendant
23 STOUTINGBURG issued from the estate of Steven Combs and told him, via text, to keep \$80 of
24 the \$480 check.

25 **Overt Act 27**

26 On or about September 11, 2013, defendant STOUTINGBURG accepted a check for \$480
27 from the estate of Steven Combs.

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1 **Overt Act 28**

2 On or about December 13, 2013, defendant ROBLEDO received a check from the FCPA
3 office for \$4,195.13 for distribution of funds from the estate of Steven Trinnich.

4 **Overt Act 29**

5 On or about December 17, 2013, defendant ROBLEDO wrote a check to defendant
6 JIMINEZ for \$2,098.00.

7 **Overt Act 30**

8 On or about May 14, 2014, defendant NESBITT texted defendant STOUTINGBURG that
9 she left him two checks from the estate of Leroy Howard for \$575 and \$595.

10 **Overt Act 31**

11 On or about May 14, 2014, defendant STOUTINGBURG accepted two checks from the
12 estate of Leroy Howard for \$575 and \$595.

13 **Overt Act 32**

14 On or about November 17, 2010, defendant WARD accepted a check from the estate of
15 Larry White for \$13,159.68.

16 **Overt Act 33**

17 On or about April 29, 2011 defendants JIMENEZ and NESBITT caused the FCPA to issue
18 two checks totaling \$15,422.41 of money that belonged to the estate of Gary Ross to defendant
19 WARD. Defendant WARD accepted and endorsed a check payable to the Central Valley Rams
20 Booster for \$15,327.41 from the estate of Gary Ross. On or about June 1, 2011 defendant
21 WARD accepted and endorsed a second check payable to the Central Valley Rams Booster for
22 \$95 from the estate of Gary Ross.

23 **Overt Act 34**

24 On or about March 10, 2011 defendant NESBITT caused the FCPA to issue a check to
25 STOUTINGBURG for \$490 from the estate of Gary Ross. Defendant STOUTINGBURG
26 accepted a check from the FCPA for the estate of Gary Ross for \$490.

27 **Overt Act 35**

28 On or about October 18, 2011, the FCPA began to administer the estate of Jack H.

1 Boghosian. Defendants JIMENEZ and NESBITT were involved in redeeming seven U.S. savings
2 bonds from the Boghosian estate. Defendants JIMENEZ and NESBITT were involved with
3 creating a shell Jack Boghosian estate where they transferred the money from the redemption of
4 the savings bonds to another shell estate of "Joel Maxey."

5 **Overt Act 36**

6 On or about April 20, 2012, defendants JIMENEZ and NESBITT caused the FCPA to issue
7 two checks totaling \$62,226.80 to Davron Maxey from the estate of Jack Boghosian. Davron
8 Maxey received two separate deposits totaling \$62,226.80 into this EECU Credit Union account.

9 **Overt Act 37**

10 During the time FCPA administered the Boghosian estate, defendant WARD listed his
11 address as 2236 North Price Street, Fresno, CA. Davron Maxey listed his address with the EECU
12 credit union account during this time period as 2236 North Price Street, Fresno, CA.

13 **Overt Act 38**

14 On or about June 4, 2012, defendant NESBITT caused the sale of a 2001 Mercury Grand
15 Marquis for \$3,000 from the Boghosian estate to Frank Banuelos, NESBITT's relative.

16 **COUNT TWO**

17 For a further and separate cause of action, being a different offense from, but connected in
18 its commission with the charges set forth in Count One, complainant says:

19 That on or about and between January 1, 2013, through December 31, 2013, defendant
20 NOE JIMENEZ, did commit a FELONY, namely, a violation of section 424, subdivision (a)(1),
21 of the Penal Code, PUBLIC OFFICER CRIME. Defendant, being a person described in Penal
22 Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public
23 moneys, did in a manner not incidental and minimal, without authority of law, appropriate funds
24 paid from proceeds of insurance policies of decedent, Frank Fields, to his use and the use of
25 another, defendant PAXTON.

26 **COUNT THREE**

27 For a further and separate cause of action, being a different offense from, but connected in
28 its commission with the charges set forth in Counts One through Two, complainant says:

1 That on or about and between January 1, 2013, through December 31, 2013, defendant
2 NOE JIMENEZ, did commit a FELONY, namely, a violation of section 504 of the Penal Code,
3 EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and fraudulently
4 appropriate to a use or purpose not in the due and lawful execution of his trust, property which he
5 had in his possession or under his control by virtue of his trust and/or did unlawfully secrete the
6 property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code
7 section 487, subdivision (a): to wit, proceeds from insurance policies, in excess of \$44,000,
8 which were property of the estate of decedent, Frank Fields.

9 **COUNT FOUR**

10 For a further and separate cause of action, being a different offense from, but connected in
11 its commission with the charges set forth in Counts One through Three, complainant says:

12 That on or about and between January 1, 2013, through December 31, 2013, defendant
13 KIRSTEN PAXTON, did commit a FELONY, namely, a violation of section 496,
14 subdivision (a), of the Penal Code, RECEIVING STOLEN PROPERTY EXCEEDING \$950 IN
15 VALUE. Defendant did unlawfully receive money and personal property that was stolen,
16 knowing the property to be stolen or obtained in a manner constituting theft: to wit, proceeds
17 from insurance policies, in excess of \$44,000, which were property of the estate of decedent,
18 Frank Fields.

19 **COUNT FIVE**

20 For a further and separate cause of action, being a different offense from, but connected in
21 its commission with the charges set forth in Counts One through Four, complainant says:

22 That on or about April 11, 2013, defendant NOE JIMENEZ, did commit a FELONY,
23 namely, a violation of section 118, subdivision (a), of the Penal Code, PERJURY BY
24 DECLARATION. Defendant did unlawfully declare as true material matters known to be false,
25 to wit: a declaration submitted to the insurer declaring under penalty of perjury under the laws of
26 this State that the Public Administrator's Office had buried Frank Fields, and that there were no
27 identified heirs to the estate of decedent, Frank Fields.
28

COUNT SIX

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Five, complainant says:

That on or about and between January 1, 2012, through December 31, 2012, defendants NOE JIMENEZ, SUSAN PATRICIA NESBITT, and REE L. BRUCE, did commit a FELONY, namely, a violation of section 424, subdivision (a)(1), of the Penal Code, PUBLIC OFFICER CRIME. Defendants, being persons described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys did, in a manner not incidental and minimal, appropriate without authority of law, valuable coins belonging to the estate of decedent, Dr. Edmund Kal, to their own use or to the use of another.

COUNT SEVEN

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Six, complainant says:

That on or about and between January 1, 2012, through December 31, 2012, defendants NOE JIMENEZ, SUSAN PATRICIA NESBITT, and REE L. BRUCE, did commit a FELONY, namely, a violation of section 504 of the Penal Code, EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendants did unlawfully and fraudulently appropriate to a use or purpose not in the due and lawful execution of his trust, which they had in their possession or under their control by virtue of trust and/or did unlawfully secrete the property with a fraudulent intent to appropriate that property to a use and purpose contrary to Penal Code section 487, subdivision (a): to wit, valuable coins belonging to the estate of decedent, Dr. Edmund Kal.

COUNT EIGHT

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Seven, complainant says:

That on or about and between January 1, 2012, through December 31, 2015, defendant NOE JIMENEZ, did commit a FELONY, namely, a violation of section 424, subdivision (a)(1), of the Penal Code, PUBLIC OFFICER CRIME. Defendant, being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public

1 moneys, did in a manner not incidental and minimal, appropriate without authority of law, a 2003
2 Volkswagen Passat belonging to the estate of decedent, Dr. Edmund Kal, to his own use or to the
3 use of another.

4 **COUNT NINE**

5 For a further and separate cause of action, being a different offense from, but connected in
6 its commission with the charges set forth in Counts One through Eight, complainant says:

7 That on or about and between January 1, 2012 through December 31, 2015, defendant NOE
8 JIMENEZ, did commit a FELONY, namely, a violation of section 504 of the Penal Code,
9 EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and fraudulently
10 appropriate to a use or purpose not in the due and lawful execution of his trust, property which he
11 had in his possession or under his control by virtue of his trust and/or did unlawfully secrete the
12 property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code
13 section 487, subdivision (a): to wit, a 2003 Volkswagen Passat belonging to the estate of
14 decedent, Dr. Edmund Kal.

15 **COUNT TEN**

16 For a further and separate cause of action, being a different offense from, but connected in
17 its commission with the charges set forth in Counts One through Nine, complainant says:

18 That on or about and between May 9, 2012 and September 30, 2013, defendant NOE
19 JIMENEZ, did commit a FELONY, namely, a violation of section 118, subdivision (a), of the
20 Penal Code, PERJURY BY DECLARATION. Defendant did unlawfully, under penalty of
21 perjury, declare as true a material matter that was known to be false, to wit: defendant signed the
22 accounting for the estate of decedent, Dr. Edmund Kal, filed with the Fresno County Superior
23 Court, knowing the accounting to be false.

24 **COUNT ELEVEN**

25 For a further and separate cause of action, being a different offense from, but connected in
26 its commission with the charges set forth in Counts One through Ten, complainant says:

27 That on or about and between May 9, 2012 and September 30, 2013, defendant NOE
28 JIMENEZ, did commit a FELONY, namely, a violation of section 134 of the Penal Code,

1 PREPARING FALSE DOCUMENTARY EVIDENCE. Defendant did unlawfully prepare a false
2 and/or ante-dated book, paper, record, instrument in writing, and other matter and thing, with
3 intent to produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as
4 genuine and true, upon a trial, proceeding, and inquiry whatever, authorized by law, to wit:
5 Defendant prepared a false accounting and record of the assets of the estate of decedent, Dr.
6 Edmund Kal, with the intent that the accounting be produced as true in a court proceeding.

7 **COUNT TWELVE**

8 For a further and separate cause of action, being a different offense from, but connected in
9 its commission with the charges set forth in Counts One through Eleven, complainant says:

10 That on or about and between January 1, 2011, through December 31, 2011, defendant
11 SUSAN PATRICIA NESBITT did commit a FELONY, namely, a violation of section 504 of the
12 Penal Code, EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and
13 fraudulently appropriate to a use or purpose not in the due and lawful execution of her trust,
14 which she had in her possession or under their control by virtue of trust and/or did unlawfully
15 secrete the property with a fraudulent intent to appropriate that property to a use and purpose
16 contrary to Penal Code section 487, subdivision (a) and exceeding Nine Hundred Fifty Dollars
17 (\$950), to wit: funds belonging to the estate of decedent, Sylvia Welch, in excess of \$8,000.

18 **COUNT THIRTEEN**

19 For a further and separate cause of action, being a different offense from, but connected in
20 its commission with the charges set forth in Counts One through Twelve, complainant says:

21 That on or about and between January 1, 2011 through December 31, 2011, defendant
22 TERRANCE LYNN WARD, did commit a FELONY, namely, a violation of section 496,
23 subdivision (a) of the Penal Code, RECEIVING STOLEN PROPERTY EXCEEDING \$950 IN
24 VALUE. Defendant did unlawfully receive money and personal property that was stolen,
25 knowing the property to be stolen or obtained in a manner constituting theft: to wit, funds
26 belonging to the estate of decedent, Sylvia Welch, in excess of \$8,000.

1 **COUNT FOURTEEN**

2 For a further and separate cause of action, being a different offense from, but connected in
3 its commission with the charges set forth in Counts One through Thirteen, complainant says:

4 That on or about and between January 1, 2010 through December 31, 2010, defendant
5 SUSAN PATRICIA NESBITT did commit a FELONY, namely, a violation of section 504 of the
6 Penal Code, EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and
7 fraudulently appropriate to a use or purpose not in the due and lawful execution of her trust,
8 which she had in her possession or under their control by virtue of trust and/or did unlawfully
9 secrete the property with a fraudulent intent to appropriate that property to a use and purpose
10 contrary to Penal Code section 487, subdivision (a) and exceeding Nine Hundred Fifty Dollars
11 (\$950): to wit, funds belonging to the estate of decedent, David Blevins, in the amount of
12 \$4,135.12.

13 **COUNT FIFTEEN**

14 For a further and separate cause of action, being a different offense from, but connected in
15 its commission with the charges set forth in Counts One through Fourteen, complainant says:

16 That on or about and between January 1, 2010, through December 31, 2010, defendant
17 TERRANCE LYNN WARD, did commit a FELONY, namely, a violation of section 496,
18 subdivision (a) of the Penal Code, RECEIVING STOLEN PROPERTY EXCEEDING \$950 IN
19 VALUE. Defendant did unlawfully receive money and personal property that was stolen,
20 knowing the property to be stolen or obtained in a manner constituting theft: to wit, funds
21 belonging to the estate of decedent, David Blevins, in the amount of \$4,135.12.

22 **COUNT SIXTEEN**

23 For a further and separate cause of action, being a different offense from, but connected in
24 its commission with the charges set forth in Counts One through Fifteen, complainant says:

25 That on or about and between January 1, 2010, through December 31, 2015, defendants
26 NOE JIMENEZ and SUSAN PATRICIA NESBITT, did commit a FELONY, namely, a violation
27 of section 424, subdivision (a)(1), of the Penal Code, PUBLIC OFFICER CRIME. Defendants,
28 being persons described in Penal Code section 424 charged with the receipt, safekeeping, transfer,

1 and distribution of public moneys, did in a manner not incidental and minimal, appropriate
2 without authority of law, appropriate a 2001 Chevrolet truck belonging to the estate of decedent,
3 Juanita McLaughlin, to their own use or to the use of another.

4 **COUNT SEVENTEEN**

5 For a further and separate cause of action, being a different offense from, but connected in
6 its commission with the charges set forth in Counts One through Sixteen, complainant says:

7 That on or about and between January 1, 2010 through December 31, 2015, defendants
8 NOE JIMENEZ and SUSAN PATRICIA NESBITT, did commit a FELONY, namely, a violation
9 of section 504 of the Penal Code, EMBEZZLEMENT EXCEEDING \$950 IN VALUE.

10 Defendants did unlawfully and fraudulently appropriate to a use or purpose not in the due and
11 lawful execution of their trust, property which they had in their possession or under their control
12 by virtue of their trust and/or did unlawfully secrete the property with a fraudulent intent to
13 appropriate it to a use and purpose contrary to Penal Code section 487, subdivision (a): to wit, a
14 2001 Chevrolet truck belonging to the estate of decedent, Juanita McLaughlin.

15 **COUNT EIGHTEEN**

16 For a further and separate cause of action, being a different offense from, but connected in
17 its commission with the charges set forth in Counts One through Seventeen, complainant says:

18 That on or about October 19, 2010, defendant SUSAN PATRICIA NESBITT, did commit a
19 FELONY, namely, a violation of section 424, subdivision (a)(1), of the Penal Code, PUBLIC
20 OFFICER CRIME. Defendant, being a person described in Penal Code section 424 charged with
21 the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not
22 incidental and minimal, appropriate without authority of law, appropriate funds from the estate of
23 decedent, MacKenzie Murdock, for her own use or the use of another, to wit, Jaslin Jones, the
24 daughter of defendant SUSAN PATRICIA NESBITT.

25 **COUNT NINETEEN**

26 For a further and separate cause of action, being a different offense from, but connected in
27 its commission with the charges set forth in Counts One through Eighteen, complainant says:

28 That on or about October 19, 2010, defendant SUSAN PATRICIA NESBITT, did commit a

FELONY, namely, a violation of section 504 of the Penal Code, EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and fraudulently appropriate to a use or purpose not in the due and lawful execution of her trust, property which she had in her possession or under her control by virtue of her trust and/or did unlawfully secrete the property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487, subdivision (a); to wit, directing that funds from the estate of decedent, MacKenzie Murdock, be issued to Jaslin Jones in the amount of \$1,850.86.

COUNT TWENTY

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Nineteen, complainant says:

That on or about and between December 1, 2013, through December 31, 2013, defendant NOE JIMENEZ, did commit a FELONY, namely, a violation of section 424, subdivision (a)(1), of the Penal Code, PUBLIC OFFICER CRIME. Defendant, being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal, appropriate without authority of law, funds from the estate of decedent, Steven Trinnich, for his own use or the use of another, defendant DESIREE ROBLEDO, the niece of defendant NOE JIMENEZ.

COUNT TWENTY-ONE

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Twenty, complainant says:

That on or about and between December 1, 2013, through December 31, 2013, defendant NOE JIMENEZ, did commit a FELONY, namely, a violation of section 504 of the Penal Code, EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and fraudulently appropriate to a use or purpose not in the due and lawful execution of his trust, property which he had in his possession or under his control by virtue of his trust and/or did unlawfully secrete the property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487, subdivision (a): to wit, funds from the estate of decedent, Steven Trinnich, in the amount of \$4,195.13 paid to defendant DESIREE ROBLEDO.

1 **COUNT TWENTY-TWO**

2 For a further and separate cause of action, being a different offense from, but connected in
3 its commission with the charges set forth in Counts One through Twenty-One, complainant says:

4 That on or about and between December 1, 2013, through December 31, 2013, defendant
5 DESIREE ROBLEDO aka LOVE ROBLEDO aka AMBER ROBLEDO, did commit a FELONY,
6 namely, a violation of section 496, subdivision (a) of the Penal Code, RECEIVING STOLEN
7 PROPERTY EXCEEDING \$950 IN VALUE. Defendant did unlawfully receive money and
8 personal property that was stolen, knowing the property to be stolen or obtained in a manner
9 constituting theft: to wit, funds from the estate of decedent, Steven Trinnich in the amount of
10 \$4,195.13.

11 **COUNT TWENTY-THREE**

12 For a further and separate cause of action, being a different offense from, but connected in
13 its commission with the charges set forth in Counts One through Twenty-Two, complainant says:

14 That on or about and between March 1, 2013, through December 31, 2013, defendant NOE
15 JIMENEZ, did commit a FELONY, namely, a violation of section 424, subdivision (a)(1), of the
16 Penal Code, PUBLIC OFFICER CRIME. Defendant, being a person described in Penal Code
17 section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did
18 in a manner not incidental and minimal, appropriate without authority of law, funds from the
19 estate of decedent, Vina Snelgrove, for his own use or the use of another.

20 **COUNT TWENTY-FOUR**

21 For a further and separate cause of action, being a different offense from, but connected in
22 its commission with the charges set forth in Counts One through Twenty-Three, complainant
23 says:

24 That on or about and between March 1, 2013, through December 31, 2013, defendant NOE
25 JIMENEZ, did commit a FELONY, namely, a violation of section 504 of the Penal Code,
26 EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and fraudulently
27 appropriate to a use or purpose not in the due and lawful execution of his trust, property which he
28 had in his possession or under his control by virtue of his trust and/or did unlawfully secrete the

property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487, subdivision (a): to wit, \$5,416.80 cash received by defendant belonging to the estate of decedent, Vina Snelgrove.

COUNT TWENTY-FIVE

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Twenty-Four, complainant says:

That on or about and between January 1, 2011, through December 31, 2014, defendant NOE JIMENEZ, did commit a FELONY, namely, a violation of section 424, subdivision (a)(1), of the Penal Code, PUBLIC OFFICER CRIME. Defendant, being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, did in a manner not incidental and minimal, appropriate without authority of law, a 1987 Ford Galaxy belonging to the estate of decedent Bufkin, for his own use or the use of another.

COUNT TWENTY-SIX

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Twenty-Five, complainant says:

That on or about and between January 1, 2011, through December 31, 2014, defendant NOE JIMENEZ, did commit a FELONY, namely, a violation of section 504 of the Penal Code, EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and fraudulently appropriate to a use or purpose not in the due and lawful execution of his trust, property which he had in his possession or under his control by virtue of his trust and/or did unlawfully secrete said property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487, subdivision (a): to wit, a 1987 Ford Galaxy belonging to the estate of decedent Bufkin.

COUNT TWENTY-SEVEN

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Twenty-Six, complainant says:

That on or about and between July 15, 2011 and December 31, 2012, defendant NOE JIMENEZ, did commit a FELONY, namely, a violation of section 118, subdivision (a), of the

1 Penal Code, PERJURY BY DECLARATION. Defendant did unlawfully, under penalty of
2 perjury, declare as true a material matter that was known to be false, to wit: defendant signed the
3 accounting for the estate of decedent Bufkin, filed with the Fresno County Superior Court,
4 knowing the accounting to be false.

5 **COUNT TWENTY-EIGHT**

6 For a further and separate cause of action, being a different offense from, but connected in
7 its commission with the charges set forth in Counts One through Twenty-Seven, complainant
8 says:

9 That on or about and between July 15, 2011 and December 31, 2012, defendant NOE
10 JIMENEZ, did commit a FELONY, namely, a violation of section 134 of the Penal Code,
11 PREPARING FALSE DOCUMENTARY EVIDENCE. Defendant did unlawfully prepare a false
12 and ante-dated book, paper, record, instrument in writing, and other matter and thing, with intent
13 to produce it, and to allow it to be produced for a fraudulent and deceitful purpose, as genuine and
14 true, upon a trial, proceeding, and inquiry whatever, authorized by law, to wit: Defendant
15 prepared a false accounting and record of the assets of the estate of decedent Bufkin, with the
16 intent that the accounting be produced as true in a court proceeding.

17 **COUNT TWENTY-NINE**

18 For a further and separate cause of action, being a different offense from, but connected in
19 its commission with the charges set forth in Counts One through Twenty-Eight, complainant says:

20 That on or about and between January 1, 2013 and December 31, 2013, defendant NOE
21 JIMENEZ, did commit a FELONY, namely, a violation of section 118, subdivision (a), of the
22 Penal Code, PERJURY BY DECLARATION. Defendant did unlawfully, under penalty of
23 perjury, declare as true a material matter that was known to be false, to wit: defendant signed
24 documents presented to the California Department of Motor Vehicles asserting the Public
25 Administrator's Office held title to vehicles on behalf of the estate of decedent, Matthew Turck,
26 knowing the statement to be false.

1 **COUNT THIRTY**

2 For a further and separate cause of action, being a different offense from, but connected in
3 its commission with the charges set forth in Counts One through Twenty-Nine, complainant says:

4 That on or about and between January 1, 2012, through December 31, 2015, defendant REE
5 L. BRUCE did commit a FELONY, namely, a violation of section 424, subdivision (a)(1) of the
6 Penal Code, PUBLIC OFFICER CRIME. Defendant, being a person described in Penal Code
7 section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys did,
8 in a manner not incidental and minimal, without authority of law, appropriate property belonging
9 to estates of decedents, including Edmund Kal and Hanson Bufkin, and sold the property for his
10 own benefit.

11 **COUNT THIRTY-ONE**

12 For a further and separate cause of action, being a different offense from, but connected in
13 its commission with the charges set forth in Counts One through Thirty hereof, complainant says:

14 That on or about and between January 1, 2012, through December 31, 2015, defendant
15 MARTY McCLUE did commit a FELONY, namely, a violation of section 424, subdivision (a)(1)
16 of the Penal Code, PUBLIC OFFICER CRIME. Defendant, being a person described in Penal
17 Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public
18 moneys did, in a manner not incidental and minimal, without authority of law, appropriate
19 property belonging to estates of decedents, and sold the property for his own benefit.

20 **COUNT THIRTY-TWO**

21 For a further and separate cause of action, being a different offense from, but connected in
22 its commission with the charges set forth in Counts One through Thirty-One, complainant says:

23 That on or about and between May 1, 2010, through May 31, 2015, defendants SUSAN
24 PATRICIA NESBITT and WILLIAM STOUTINGBURG JR., did commit a FELONY, namely,
25 a violation of section 504 of the Penal Code, EMBEZZLEMENT EXCEEDING \$950 IN
26 VALUE. Defendants did unlawfully and fraudulently appropriate to a use or purpose not in the
27 due and lawful execution of the Public Administrator's trust, property which defendant NESBITT
28 he had in her possession or under her control by virtue of her trust and/or did unlawfully secrete

the property with a fraudulent intent to appropriate it to a use and purpose contrary to Penal Code section 487, subdivision (a): to wit, funds belonging to estates of decedents, estates that were administered by the Fresno County Public Administrator's Office.

COUNT THIRTY-THREE

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Thirty-Two, complainant says:

That on or about and between May 1, 2010, through May 31, 2015, defendant WILLIAM STOUTINGBURG JR., did commit a FELONY, namely, a violation of section 496, subdivision (a) of the Penal Code, RECEIVING STOLEN PROPERTY EXCEEDING \$950 IN VALUE. Defendant did unlawfully receive money and personal property that was stolen, knowing the property to be stolen or obtained in a manner constituting theft: to wit, funds belonging to estates of decedents, estates that were administered by the Fresno County Public Administrator's Office.

COUNT THIRTY-FOUR

For a further and separate cause of action, being a different offense from, but connected in its commission with the charges set forth in Counts One through Thirty-Three hereof, complainant says:

That on or about and between January 1, 2010, through December 31, 2014, defendant NOE JIMENEZ, did commit a FELONY, namely, a violation of section 424, subdivision (a)(3), of the Penal Code, PUBLIC OFFICER CRIME. Defendant, being a person described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of public moneys, directed and authorized false and incomplete entries in the records of decedents' estates being administered by the Public Administrator's Office, and failed to record property belonging to estates in the accounting and inventory of the estates.

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1 **COUNT THIRTY-FIVE**

2 For a further and separate cause of action, being a different offense from, but connected in
3 its commission with the charges set forth in Counts One through Thirty-Four hereof, complainant
4 says:

5 That on or about and between January 1, 2010, through December 31, 2014, defendant
6 SUSAN PATRICIA NESBITT, did commit a FELONY, namely, a violation of section 424,
7 subdivision (a)(3), of the Penal Code, PUBLIC OFFICER. Defendant, being a person described
8 in Penal Code section 424 charged with the receipt, safekeeping, transfer, and distribution of
9 public moneys, directed and authorized false and incomplete entries in the records of decedents'
10 estates being administered by the Public Administrator's Office, and failed to record property
11 belonging to estates in the accounting and inventory of the estates.

12 **COUNT THIRTY-SIX**

13 For a further and separate cause of action, being a different offense from, but connected in
14 its commission with the charges set forth in Counts One through Thirty-Five hereof, complainant
15 says:

16 That on or about and between January 1, 2012, through December 31, 2012, the defendant
17 REE L. BRUCE did commit a felony violation of Penal Code § 496(a) by having in his
18 possession property belonging to the estate of Edmund Kai (sic) in excess of \$950 when that
19 property was stolen from the estate of Edmund Kai (sic) and the DEFENDANT either knew of
20 reasonably should have known that property was stolen.¹

21 **COUNT THIRTY-SEVEN**

22 For a further and separate cause of action, being a different offense from, but connected in
23 its commission with the charges set forth in Counts One through Thirty-Six, complainant says:

24 That on or about and between January 1, 2010, through December 31, 2010, defendant
25 TERRANCE LYNN WARD, did commit a FELONY, namely, a violation of section 496,
26 subdivision (a) of the Penal Code, RECEIVING STOLEN PROPERTY EXCEEDING \$950 IN

27 ¹ On February 27, 2018, the Attorney General orally amended Count 35, and added to the
28 complaint by the Honorable Don D. Penner. Defendant Ree L. Bruce pled guilty to this count on
February 27, 2018.

1 VALUE. Defendant did unlawfully receive money and personal property that was stolen,
2 knowing the property to be stolen or obtained in a manner constituting theft: to wit, funds
3 belonging to the estate of decedent, Larry White, in excess of \$13,000.

4 **COUNT THIRTY-EIGHT**

5 For a further and separate cause of action, being a different offense from, but connected in
6 its commission with the charges set forth in Counts One through Thirty-Seven, complainant says:

7 That on or about and between January 1, 2010, through December 31, 2010, defendant
8 SUSAN PATRICIA NESBITT did commit a FELONY, namely, a violation of section 504 of the
9 Penal Code, EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and
10 fraudulently appropriate to a use or purpose not in the due and lawful execution of her trust,
11 which she had in her possession or under their control by virtue of trust and/or did unlawfully
12 secrete the property with a fraudulent intent to appropriate that property to a use and purpose
13 contrary to Penal Code section 487, subdivision (a) and exceeding Nine Hundred Fifty Dollars
14 (\$950), to wit: funds belonging to the estate of decedent, Larry White, in excess of \$13,000.

15 **COUNT THIRTY-NINE**

16 For a further and separate cause of action, being a different offense from, but connected in
17 its commission with the charges set forth in Counts One through Thirty-Eight, complainant says:

18 That on or about and between April 1, 2012, through June 30, 2012, defendant SUSAN
19 PATRICIA NESBITT did commit a FELONY, namely, a violation of section 504 of the Penal
20 Code, EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and
21 fraudulently appropriate to a use or purpose not in the due and lawful execution of her trust,
22 which she had in her possession or under their control by virtue of trust and/or did unlawfully
23 secrete the property with a fraudulent intent to appropriate that property to a use and purpose
24 contrary to Penal Code section 487, subdivision (a) and exceeding Nine Hundred Fifty Dollars
25 (\$950), to wit: funds belonging to the estate of decedent, Jack H. Boghosian, in excess of
26 \$60,000.

27 ///

28 ///

1 **COUNT FORTY**

2 For a further and separate cause of action, being a different offense from, but connected in
3 its commission with the charges set forth in Counts One through Thirty-Nine, complainant says:

4 That on or about and between April 1, 2012, through June 30, 2012, defendant SUSAN
5 PATRICIA NESBITT, did commit a FELONY, namely, a violation of section 424,
6 subdivision (a)(1), of the Penal Code, PUBLIC OFFICER CRIME. Defendant, being a person
7 described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and
8 distribution of public moneys, did in a manner not incidental and minimal, appropriate without
9 authority of law, appropriate funds from the estate of decedent, Jack H. Boghosian, for her own
10 use or the use of another, Davron Maxey and Frank Banuelos.

11 **COUNT FORTY-ONE**

12 For a further and separate cause of action, being a different offense from, but connected in
13 its commission with the charges set forth in Counts One through Forty, complainant says:

14 That on or about and between December 9, 2010, through December 31, 2011, defendant
15 SUSAN PATRICIA NESBITT did commit a FELONY, namely, a violation of section 504 of the
16 Penal Code, EMBEZZLEMENT EXCEEDING \$950 IN VALUE. Defendant did unlawfully and
17 fraudulently appropriate to a use or purpose not in the due and lawful execution of her trust,
18 which she had in her possession or under their control by virtue of trust and/or did unlawfully
19 secrete the property with a fraudulent intent to appropriate that property to a use and purpose
20 contrary to Penal Code section 487, subdivision (a) and exceeding Nine Hundred Fifty Dollars
21 (\$950), to wit: funds belonging to the estate of decedent, Gary Ross, in excess of \$15,000.

22 **COUNT FORTY-TWO**

23 For a further and separate cause of action, being a different offense from, but connected in
24 its commission with the charges set forth in Counts One through Forty-One, complainant says:

25 That on or about and between December 9, 2010, through December 31, 2011, defendant
26 SUSAN PATRICIA NESBITT, did commit a FELONY, namely, a violation of section 424,
27 subdivision (a)(1), of the Penal Code, PUBLIC OFFICER CRIME. Defendant, being a person
28 described in Penal Code section 424 charged with the receipt, safekeeping, transfer, and

1 distribution of public moneys, did in a manner not incidental and minimal, appropriate without
2 authority of law, appropriate funds from the estate of decedent, Gary Ross, for her own use or the
3 use of another, TERRANCE LYNN WARD and WILLIAM STOUTINGBURG JR.

4 **COUNT FORTY-THREE**

5 For a further and separate cause of action, being a different offense from, but connected in
6 its commission with the charges set forth in Counts One through Forty-Two, complainant says:

7 That on or about and between December 9, 2010, through December 31, 2011, defendant
8 TERRANCE LYNN WARD, did commit a FELONY, namely, a violation of section 496,
9 subdivision (a) of the Penal Code, RECEIVING STOLEN PROPERTY EXCEEDING \$950 IN
10 VALUE. Defendant did unlawfully receive money and personal property that was stolen,
11 knowing the property to be stolen or obtained in a manner constituting theft: to wit, funds
12 belonging to the estate of decedent, Gary Ross, in excess of \$15,000.

13
14 **SPECIAL ALLEGATION-EXCESSIVE LOSS OVER \$65,000**

15 It is further alleged as to Counts check 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 16, 17, 20, 21, 23, 24,
16 25, 26, 27, 28, 29, and 33, that in the commission of the above offenses, defendant, NOE
17 JIMENEZ, with the intent to do so, took, damaged, and destroyed property of a value exceeding
18 sixty-five thousand dollars (\$65,000), within the meaning of Penal Code section 12022.6,
19 subdivision (a)(1).

20 It is further alleged as to Counts 1, 6, 7, 12, 14, 16, 17, 18, 19, 32, 34, and 37-41 that in the
21 commission of the above offenses, defendant SUSAN PATRICIA NESBITT, with the intent to
22 do so, took damaged, and destroyed property of a value exceeding sixty-five thousand dollars
23 (\$65,000), within the meaning of Penal Code section 12022.6, subdivision (a)(1).

24
25 **TOLLING OF THE STATUTE OF LIMITATIONS**

26 IT IS FURTHER ALLEGED, as described in Penal Code section 803, subdivision (c),
27 that none of the above violations were discovered earlier than April 17, 2015, when the Fresno
28 County general email inbox received an unsigned email reporting possible misconduct at the

Fresno County Public Administrator's Office (FCPA) by Defendant REE L. BRUCE and other personal allegations. The reporting party also alleged that she had reached out to other employees at the FCPA for assistance to no avail. On April 20, 2015, that email was forwarded to the Fresno County District Attorney's Office, who initiated an investigation. When Fresno County District Attorney investigators interviewed the reporting party, she mentioned two other senior employees at the FCPA, "Noe" and "Susan." This led investigators to examine the FCPA, and specifically the roles and duties of Defendant REE L. BRUCE, and the other two senior employees at the FCPA, Defendants NOE JIMENEZ and SUSAN PATRICIA NESBITT. Investigators learned that the function of the FCPA is to manage estates and make final arrangements for Fresno County residents who die without a will or any known relatives able or willing to act on a decedent's behalf. The FCPA's role was to manage the estate until proper distribution of the proceeds of the estate could be completed.

Defendant NOE JIMENEZ was a Fresno County employee and held the position of Deputy Probate Administrator with the FCPA. Defendant SUSAN PATRICIA NESBITT was a Fresno County employee and held the position of Senior Probate Administrator with the FCPA. Defendant REE L. BRUCE was a Fresno County employee and held the position of Property Assistant for the FCPA. Defendants NOE JIMENEZ and SUSAN PATRICIA NESBITT were responsible for overseeing and administering the estates for the FCPA. In practice, either NOE JIMENEZ or SUSAN PATRICIA NESBITT were the designated contacts for FCPA with respect to decedents without identifiable heirs. For estates with assets less than \$150,000, there was little to no court oversight of these estates and the Defendants. The estates identified in the violations alleged were the types of estates that required little to no court involvement.

Defendants NOE JIMENEZ, SUSAN PATRICIA NESBITT, and REE L. BRUCE worked with another county employee, Defendant MARTY CHARLES McCLUE, and other personal associates, Defendants KIRSTEN PAXTON, TERRANCE LYNN WARD, DESIREE ROBLEDO, and WILLIAM STOUTINGBURG JR. Defendant TERRANCE LYNN WARD was an associate of Defendant NESBITT. Defendant WILLIAM STOUTINGBURG JR. is Defendant SUSAN PATRICIA NESBITT'S nephew.

1 DA investigators and California Department of Justice Special Agent discovered the theft
2 and misconduct of the DEFENDANTS through the investigation detailed above, as well as by
3 examining records maintained by Defendants NOE JIMENEZ and SUSAN PATRICIA
4 NESBITT for the FCPA. The victims of the above violations, and any law enforcement agency
5 chargeable with the investigation and prosecution of any violation, did not have actual and
6 constructive knowledge of the violation prior to the discovery date because DEFENDANTS NOE
7 JIMENEZ and SUSAN PATRICIA NESBITT were solely responsible for administering the
8 estates, as well as creating and maintaining the records of the estates identified in the violations
9 alleged.

10
11 I declare under penalty of perjury that the foregoing is true and correct.

12
13 Dated: January 27, 2020

Respectfully Submitted,

14 XAVIER BECERRA
15 Attorney General of California

16 

17 TIFFANY J. SUSZ
18 Deputy Attorney General
19 *Attorneys for People of the State of*
20 *California*

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **People of the State of California v. Noe Jimenez, et al.**
No.: **F17901545**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On January 29, 2020, I served the attached **INFORMATION** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Roger T. Nuttall
Nuttall & Coleman
2333 Merced Street
Fresno, CA 93721
Attorney for Defendant William Stoutingburg, Jr.

Charles F. Magill
MAGILL & GUZMAN MAGILL, PC
1060 Fulton Mall, Suite 806
Fresno, CA 93721
Attorney for Defendant Susan Nesbitt

Marshall Hodgkins
1186 W. Shaw Ave., Suite 103
Fresno, CA 93711
Attorney for Defendant Terrance Ward

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on January 29, 2020, at Sacramento, California.

Ashley Harrison
Declarant


Signature